

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

William Shawn HAYWARD

Case: 2:21-mj-30501

Assigned To : Unassigned

Assign. Date : 10/26/2021

CMP: USA v Hayward (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 25, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 875(c)

Transmit interstate/foreign commerce with a threat to injure

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.


Date: October 26, 2021

City and state: Detroit, Michigan


Complainant's signature

Special Agent Katy Krieg - SSA

Printed name and title


Judge's signature

Honorable Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Your Affiant, Special Agent Katy Krieg, asserts that the following information is true to the best of my knowledge, information, and belief:

I. INTRODUCTION

1. I am a Special Agent with the Social Security Administration, Office of Inspector General, Office of Investigations (SSA/OIG/OI), assigned to the Chicago Field Division, Detroit Sub-Office, and have been so employed since August of 2010. During that time, I have conducted investigations of fraud, waste, and abuse of benefit programs administered by the SSA. I hold a Bachelor of Science in Criminal Justice and Psychology from Southern Illinois University-Edwardsville, and a Masters of Public Administration from the University of Michigan-Dearborn. I am a graduate of the Federal Law Enforcement Training Center. In connection with my official duties as a special agent, I investigate violations of federal law, including but not limited violations of Social Security laws and related statutes, including but not limited to Title 18, United States Code, Section 875(c), interstate communications with a threat to injure.

2. This affidavit is made in support of a criminal complaint and warrant for the arrest of WILLIAM SHAWN HAYWARD, for violation of Title 18, United States Code, Section 875(c).

3. This affidavit is based on my investigation and information provided to me by others. This affidavit is submitted for the limited purpose of establishing probable cause and does not set forth all information known to me about the investigation.

4. The incident that gives rise to this affidavit occurred on October 25, 2021, at the Social Security Administration (SSA) located at 9222 Grand River Avenue, Detroit, Michigan, which is in the territorial jurisdiction of the United States.

II. PROBABLE CAUSE

5. On October 25, 2021, at approximately 10:29 a.m., WILLIAM SHAWN HAYWARD telephonically contacted the Grand River SSA office, seeking to discuss his benefits.

6. HAYWARD phoned the SSA General Information telephone number, 866-405-0043, and was connected with an identified SSA federal employee, hereinafter identified as Victim One (VC-1). VC-1 has

had prior telephonic interactions with HAYWARD and stated she recognized the voice on the telephonic phone line as HAYWARD.

7. HAYWARD identified himself and began yelling into the phone at VC-1 while demanding to be transferred to the SSA Security Officer. VC-1 advised HAYWARD she could not transfer him to the Security Officer, and HAYWARD replied, "fuck off," and "you all better be ready because I'm on my way to fuck you guys up!" HAYWARD repeated himself a couple times and then said, "Your security guard better be ready, I'm on my way!" There was a lot of profanity mixed into the yelling.

8. VC-1 advised HAYWARD repeated the aforementioned statement several additional times before VC-1 terminated the communication. VC-1 advised the communication made her feel very uncomfortable and nervous that he was going to come to the building. VC-1 felt that HAYWARD's threats were real and that he was going to do something.

9. At 11:37 a.m., HAYWARD phoned the SSA General Information telephone number, 866-405-0043, and was connected with an identified SSA employee, hereinafter identified as Victim Two (VC-

1). VC-2 has had prior telephonic interactions with HAYWARD and stated she recognized the voice on the line as HAYWARD.

10. VC-2 stated HAYWARD phoned and requested to speak with a manager. VC-2 requested HAYWARD's personally identifiable information, to which HAYWARD responded he did not need to give VC-2 the requested information. VC-2 advised HAYWARD stated, "Do you know you are talking to a Marine?" and "Do you think you fucking untouchable? I'm coming up there to show you, you ain't untouchable." HAYWARD then proceeded to yell vulgar language and VC-2 disconnected the call. VC-2 described HAYWARD as being very agitated and yelling profanity during the call. His demands and threats are becoming more frequent and vulgar. VC-2 felt that he would come to the office and make good on his threats.

11. VCs-1 and 2 are employed by the SSA and were engaged in the performance of their official duties when speaking to HAYWARD. The SSA office was occupied by federal employees and contractors at the time of HAYWARD's threats.

12. I conducted a query of law enforcement databases which revealed that HAYWARD, as a matter of record and through various

sources of information, has a violent criminal history involving assaultive behavior. Additionally, HAYWARD has made prior threats to kill federal employees in the past.

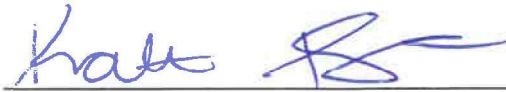
13. Management staff with the SSA have confirmed that calls made to the Grand River SSA office located at 9222 Grand River Avenue, Detroit, Michigan, are routed through Baltimore, Maryland, meaning there is probable cause to believe the communications described herein were transmitted interstate. *See United States v. Houston*, 683 F. App'x 434, 439-440 (6th Cir. 2017).

III. CONCLUSION

14. Probable cause exists that on or about October 25, 2021, WILLIAM SHAWN HAYWARD transmitted in interstate commerce communications to VC-1 and VC-2 that contained a threat to injure VC-

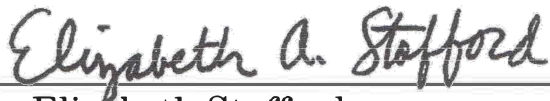
1, VC-2, and other SSA federal employees, in violation of Title 18,
United States Code, Section 875(c).

Respectfully submitted,



Katy Krieg
Special Agent
Social Security Administration,
Office of Inspector General

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Hon. Elizabeth Stafford
United States Magistrate Judge

Date: October 26, 2021